

United States v. Jack Stephen Pursley, 4:18CR575 (Hughes)

Exhibit 1: Government's Amended Direct Questions of Kerry Smith

1. State and spell your name
2. What country do you currently reside in?
3. Where are you currently employed?
4. Where?
5. Are you familiar with a company called Isle of Man Financial Trust Limited ("IOMFT")?
6. How are you familiar with IOMFT?
7. Is IOMFT still in business?
8. When did it close?
9. Did IOMFT go by any other names?
10. Where was it located?
11. What types of business did it conduct?
12. On what dates did you work at IOMFT?
13. What was your position there?
14. What were your duties and responsibilities as compliance officer?
15. Did there come a time when IOMFT was sold to another company?
16. When was that?
17. What was the name of the company that bought IOMFT?
18. What was the business of Boston Limited?
19. Did you also work for Boston Limited?
20. On what dates did you work for Boston Limited?
21. What was your job title when you worked for Boston Limited?
22. What were your duties and responsibilities?
23. Did Boston Limited take over all accounts from IOMFT?
24. Are you familiar with a company called Southeastern Shipping Company Limited ("SES")?
25. What is SES?
26. Was SES a client of IOMFT?
27. Are you familiar with a company called Pelhambridge?
28. What was Pelhambridge?
29. Was Pelhambridge a client of IOMFT?
30. Did Boston Limited take over the Pelhambridge account when it bought IOMFT?
31. To your knowledge, were all of the paper and electronic files maintained by IOMFT transferred to Boston Limited at the time that it acquired IOMFT?
32. Is it fair to say that any documents related to Pelhambridge that were created prior to April 2013 (when Boston Limited bought IOMFT) were created or maintained by IOMFT then transferred to Boston Limited?
33. Show Govt. Ex. 2-1. Please turn to page 3 (Bates ending 003) entitled "Witness Statement of James Joseph Shimmin."
34. Do you know James Shimmin?
35. How do you know him?
36. Was James Shimmin employed by Boston Limited?
37. Turning your attention to page 3, paragraph 6. This reads: "the only person or entity to which Boston Limited has provided corporate services is Pelhambridge Limited. Boston Limited

first began to provide corporate services to Pelhambridge Limited on 1 April 2013. Pelhambridge was dissolved on 4 April 2014.” Are these statements true to the best of your knowledge?

38. Were SES and Pelhambridge related companies?
39. How were they related?
40. Why was the SES account not transferred to Boston Limited?
41. As part of your job duties when you worked at IOMFT, did you work on the accounts for SES and Pelhambridge?
42. What was your role in working on those accounts?
43. Did you continue to handle the Pelhambridge account while you worked for Boston Limited?
44. Was part of IOMFT and Boston Limited’s business to incorporate companies in the IOM for clients?
45. Are you familiar with the term shelf company?
46. What is a shelf company?
47. Was Pelhambridge a shelf company?
48. Did the companies that IOMFT and Boston Limited worked with have boards of directors?
49. Who normally served as board members of those companies?
50. Did those boards of directors hold meetings?
51. Were those meeting memorialized in any way?
52. How?
53. When?
54. Did IOMFT and Boston Limited maintain files for the companies who were their clients?
55. Did those files have a name?
56. Did they have a number?
57. How was the number assigned to each company?
58. Did that number remain the same when Boston Limited purchased IOMFT?
59. What did those files generally contain?
60. Are you familiar with the term “KYC document”?
61. What does KYC stand for?
62. What is a KYC document?
63. Did the client files of IOMFT and Boston Limited contain KYC documents?
64. Were those documents updated in the regular course of IOMFT and Boston Limited’s business?
65. Was it part of your duties and responsibilities when you worked at IOMFT and Boston Limited to maintain KYC documents?
66. Are you familiar with the term “file note” as it related to your work at IOMFT and Boston Limited?
67. What is a file note?
68. Did you compose file notes as part of your job when you worked at IOMFT and Boston Limited?
69. Did you write the notes at or near the time that the event recorded in the note took place?
70. Did IOMFT and Boston Limited conduct business over the phone with clients?
71. Were these conversations memorialized in any way?
72. How?
73. Were these records kept in the client file?
74. Did the employees of IOMFT and Boston Limited maintain email accounts?

75. Was there a company policy at IOMFT or Boston Limited about maintaining email communications with each other or with clients?
76. Was it part of your duties and responsibilities at IOMFT to work on the SES and Pelhambridge client accounts?
77. What was your role?
78. Who else at IOMFT worked on the SES and Pelhambridge accounts?
79. What was Andrew Thomas's role?
80. What was Nigel Tebay's role?
81. What was Andrew Mellor's role?
82. What was Lisa Jude's role?
83. Did SES have a bank account?
84. At what bank?
85. Did IOMFT manage the account of SES?
86. Where was the bank account located?
87. Who were the signatories on SES account?
88. Did Pelhambridge have a bank account?
89. Where?
90. Who were the signatories?
91. Are you familiar with someone by the name of Shaun Mooney?
92. How are you familiar with him?
93. When did you learn of Shaun Mooney?
94. Going back to Pelhambridge, to your knowledge, did Pelhambridge conduct any business?
95. Did it make any profits?
96. Did it have a designated office location?
97. Did it have any employees?
98. Are you familiar with the term beneficial owner?
99. What is a beneficial owner?
100. When you first began working for IOMFT, who had IOMFT been treating as the beneficial owner of SES?
101. Who had IOMFT been treating as the beneficial owner of Pelhambridge?
102. Who was IOMFT's primary contact with respect to the business and financial operations of SES? Of Pelhambridge?
103. Show Govt. Ex. 2-7 – do you recognize this document?
104. What is it?
105. What is the date on this document?
106. Do you know who wrote this document?
107. Would it have been the normal course of IOMFT's business to keep this type of document in the client file?
108. This document discusses the loan to Pelhambridge. Who was the lender?
109. How much was the loan for?
110. What was the purpose of the loan?
111. Do you know who this document was signed by?
112. Show Govt. Ex 1-27 – do you recognize this document?
113. What is it?
114. What is an FSP Source of Wealth Form used for?
115. There are two dates on this document. What do they represent?

116. Does this form show when Pelhambridge was created?
117. When was it created?
118. Who is identified as the beneficial owner of Pelhambridge on this form?
119. According to this form, how long had Shaun Mooney been a client of IOMFT?
120. What were the assets in Pelhambridge at the time this form was created?
121. Page 1 refers to a loan to Pelhambridge. What was the purpose of this loan?
122. Turning to page 2, the name at the bottom of the form is Emma Weston. Who is Emma Weston?
Do you know whose signature appears below Emma Weston's name as the reviewer?
123. Show Govt. Ex. 2-10 – do you recognize this document?
124. What is it?
125. Who created this document?
126. What is an FSP Company Review Form used for?
127. Is this a form that was normally used by IOMFT in the course of its business?
128. There are two dates on this form. What do they represent?
129. At the top, who is listed as the administrator of Pelhambridge?
130. Directing your attention to the top comment box on page 1, for the KYC/AML Activities. Who is identified as the beneficial owner of Pelhambridge?
131. Turning to the bottom of page 1, what does "SOW / SOF" stand for?
132. What is your understanding of the note to the right that says "No SOF form on file although loans from Southeastern Shipping Company Limited"?
133. Turning to the last page of this document, (p. 4). It refers to a risk profile and notes to "update Lynx Notes 'Risk Profile' to reflect above risk factors." What is a risk profile?
134. What factors go into determining a risk profile?
135. What was Pelhambridge's risk profile on the overall rating scale listed on this page?
136. Why?
137. Show Govt. Ex. 2-71 – looking at the first page of this document, what is it?
138. What is the date of the minutes?
139. Do you know who created these minutes?
140. Turning to the second page through the last page of this document, what is this?
141. Who is listed as the owner of Pelhambridge?
142. Show Govt. Ex. 2-27 – do you recognize this document?
143. What is it?
144. Do you recognize the letterhead?
145. What is the date on this document?
146. At this point, whom did IOMFT view as the beneficial owner of both SES and Pelhambridge?
147. Sometime in or about April 2009, did you or one of your colleagues contact Shaun Mooney regarding his account with IOMFT?
148. Who contacted Shaun Mooney?
149. Why?
150. What were your concerns?
151. Did you discuss your concerns with Shaun Mooney?
152. What did you say?
153. Did you voice your concerns to anyone inside of IOMFT?
154. To whom?

155. What was the substance of those conversations?
156. What caused or prompted your concern about the beneficial ownership of SES and Pelhambridge?
157. Did you meet with Mr. Mooney in the Isle of Man sometime in April 2009?
158. Whose idea was it to have that meeting?
159. Who was at the meeting?
160. Where did the meeting take place?
161. What did you say to Shaun Mooney in that meeting?
162. What was his response?
163. How was it left at the end of the meeting?
164. Do you know someone by the name of Jack Stephen Pursley?
165. How do you know him?
166. Do you see him in the courtroom today?
167. Please point to him and identify an article of clothing he is wearing.
168. Did there come a time in May 2009 when you met Jack Stephen Pursley?
169. What did you know of Mr. Pursley before you met him?
170. Was this the first time you had met him in person?
171. Where was the meeting?
172. Who attended the meeting?
173. How did the meeting come about?
174. At that time, who did you understand the beneficial owner of SES to be? Of Pelhambridge?
175. What was the basis for your understanding?
176. Did you discuss this with Mr. Pursley?
177. Show Govt. Ex. 2-22 – do you recognize this?
178. What is it?
179. Did you create this document?
180. When?
181. What is the date on the document?
182. Does this document accurately reflect discussions you had with Mr. Pursley when he traveled to the Isle of Man in 2009?
183. What did you understand Mr. Pursley's goal to me in these discussion?
184. What if anything did he want to accomplish?
185. What if anything did you want to accomplish?
186. What discussion did you have with Mr. Pursley about any tax consequences with respect to the funds in the SES or Pelhambridge accounts?
187. Did Mr. Pursley tell you anything else about the tax consequences to moving money from the Isle of Man to the United States?
188. Did Mr. Pursley discuss any tax consequences that might come to himself as a result of the transfers?
189. Did you discuss beneficial ownership of SES or Pelhambridge during this meeting?
190. What was the substance of this discussion?
191. Why did it matter who the beneficial owner of SES and Pelhambridge was?
192. Paragraph 7 states that IOMFT has always treated Mr. Mooney as the beneficial owner of SES. Is this true?
193. Why was this the case?

194. Did you discuss the monetary worth of SES at this time?
195. How much money was held in SES's RBS account at the time?
196. Paragraph 7 also indicates that you discussed an acquisition agreement with respect to the purchase of SES at this meeting. Do you recall this discussion?
197. Did Mr. Pursley provide you with a copy of this contract?
198. Did you ask for a copy?
199. What was your understanding of the acquisition that was to take place?
200. Did you discuss at the meeting any criminal liability on the part of IOMFT?
201. Did you at this or any other time show Mr. Pursley documents related to the beneficial ownership of SES or Pelhambridge?
202. Who did those documents say was the beneficial owner of SES and Pelhambridge?
203. As a result of the meeting, did you arrive at an action plan with Mr. Pursley?
204. Did Shaun Mooney approve of this action plan?
205. What was the goal of the action plan?
206. Show Govt. Ex. 2-31 – looking at the first page of this document, do you recognize?
207. What is it?
208. Looking at the second page of this document, what is this?
209. What is the date of this document?
210. Is this the same date as Govt. Ex. 2-22 that we just discussed?
211. Do both exhibits reflect the same meeting with Mr. Pursley?
212. Paragraph 1 of the action plan references a consulting agreement between SES and Shaun Mooney – whose idea was it to create a consulting agreement?
213. What was the purpose of such a consulting agreement?
214. To your knowledge, had Mr. Mooney ever had a consulting agreement with SES before?
215. Was a consulting agreement actually created?
216. When was it created?
217. Who created it?
218. Did you discuss backdating the consulting agreement with anyone?
219. Who did you discuss this with?
220. What was the sum and substance of that discussion?
221. Who came up with the steps of the action plan that are listed in the file note?
222. Several of the action plan steps involve a man identified as Eduard Venerable?
223. What did you know about Eduard Venerable at that time?
224. Had you ever met Mr. Venerable at that time?
225. Do you know if any other employees of IOMFTL had met Mr. Venerable at that time?
226. What did Mr. Pursley tell you about Mr. Venerable at the meeting?
227. What is the acquisition agreement identified in paragraph 4?
228. Is this the same agreement as that referred to in Govt. Ex. 2-22?
229. Are you familiar with a company called Acquisition Partners?
230. Where was it incorporated if you know?
231. Who was acquiring what, per that agreement?
232. What did you tell Mr. Pursley about the need for IOMFT to approve any plans for the purchase of SES?
233. Why did IOMFT have to approve any plan for the purchase of SES?
234. Did you ever discuss with Mr. Pursley or Mr. Mooney a concern about wiring funds to a United States bank account?

235. What concerns did you have?
236. Paragraph 7 says that contact is to be made with Mr. Venerabile. Did Mr. Pursley tell you that he would contact Mr. Venerabile?
237. Did Mr. Pursley tell you where Eduard Venerabile was?
238. Where was that?
239. Did he tell you what Eduard Venerabile did for a living?
240. What was that?
241. Where was Eduard Venerabile from?
242. What did you understand Mr. Venerabile's relationship to Mr. Pursley to be?
243. Was Mr. Venerabile ever a signatory on the SES bank accounts, to your knowledge?
244. Who was to be appointed as attorney for Shaun Mooney, according to paragraph 9?
245. Are you aware if the acquisition plan ever came to pass?
246. Why not?
247. Show Govt. Ex. 2-32 – do you recognize this document?
248. What is it?
249. Did you create this document?
250. When?
251. There are two dates on this document. What is the correct date?
252. What does this form memorialize?
253. On what date did the phone call take place?
254. Do you recall this phone conversation?
255. Where was Mr. Venerabile when you spoke with him on May 28th?
256. Do you know if anyone else was there with him?
257. What did you tell Mr. Venerabile about who IOMFT had been treating as the beneficial owner?
258. What did you say to him about the financial position of SES?
259. Show Govt. Ex. 2-33, 12-36, 12-46, 12-38, 12-7, 4-49, 12-35, 4-180, 2-28 – do you recognize these emails?
260. Are these all emails between you and Mr. Pursley during 2009?
261. Was this a regular part of the business you conducted on behalf of IOMFT?
262. Was email your primary method of communication with Mr. Pursley?
263. Did you also have telephone conversations with him?
264. How often did you have telephone conversations with Mr. Pursley during 2009?
265. Approximately how many times total did you meet with Mr. Pursley in person during 2009?
266. Show Govt. Ex. 2-29 – do you recognize these documents?
267. Turning to pp. 2-4 (Bates ending 095 through 097). Did you create this document?
268. What is the date on this document?
269. Was this also the date that the telephone conversation between you and Mr. Pursley took place?
270. What did you discuss in the June 9, 2009 telephone call?
271. Why were you discussing your traveling to Brazil?
272. Turning to p. 3, paragraph 5 (Bates ending 096) – what did you discuss about the ownership of Pelhambridge?
273. What did you tell Mr. Pursley about why Shaun Mooney was set up as the owner of Pelhambridge?

274. Who did Mr. Pursley tell you who the owner of Pelhambridge was?
275. Did that comport with the records of IOMFT?
276. Show Govt. Ex. 12-40 – do you recognize this document?
277. What is it?
278. Turning to p. 3, (Bates ending 612), what is this document?
279. According to this document, who is going to act on behalf of Eduard Venerabile?
280. Show Govt. Ex. 12-45 – do you recognize this email?
281. What is it?
282. What were the “travel arrangements” were you referring to?
283. What “new arrangements” were you referring to?
284. Did you in fact meet with Mr. Pursley in August of 2009?
285. Where did that meeting take place?
286. Who was present at that meeting?
287. What was the purpose of that meeting?
288. What did you discuss at that meeting?
289. At some point did you learn that the acquisition agreement contract was not going to proceed?
290. Did you have a discussion with Mr. Pursley about this?
291. When?
292. Where?
293. What did Mr. Pursley tell you as to why the contract was not going to be finalized?
294. What there a new plan?
295. What was it?
296. What is your understanding of how the money was going to be used once it went to the United States?
297. When did you first hear that the money would be used to invest in real estate?
298. Are you familiar with a company called Australian Partners Holding Corp?
299. What is your understanding of the functioning of this company?
300. Where was the company formed?
301. By whom was it formed?
302. Who was the owner?
303. Did it have any employees?
304. Did it have a bank account?
305. What was the purpose of forming the company?
306. Show Govt. Ex. 4-110 – do you recognize this document?
307. What is it?
308. This document refers to a Mr. Gillis. Who is that?
309. What was your understanding of Mr. Gillis’s role with respect to the new plan?
310. Do you recall what documents you had requested from Mr. Gillis?
311. Show Govt. Ex. 4-117 – do you recognize this document?
312. What is it?
313. This exhibit contains emails between you and Mr. Pursley. The email at the top of page one from you to Mr. Pursley on August 26, 2009 at 10:31 am states that “ultimate ownership is changing from Eduard to APHL” – what did this mean?
314. What does the “ultimate ownership” refer to?
315. At this time, who did IOMFT identify as the owner of SES? Of Pelhambridge?

316. Based on what?
317. Show Govt. Ex. 1-38 – do you recognize this document?
318. What is it?
319. Looking at the top of page 1, there are two dates on this document. Why?
320. What do the two dates represent?
321. Turning to the top of page 1, it says “Lynx Ref: CO1876.” What is this?
322. What was the reference number for SES?
323. Here where it says “originals on CO1619” and lists the beneficial owner as Shaun Mooney, what does this indicate?
324. On Page 4 (Bates ending 315), “cancelled” with a line across the page is written in; did you write this?
325. Why?
326. So you changed the ownership of Pelhambridge from Mr. Mooney to Mr. Venerabile?
327. Why?
328. Did anyone tell you to do this?
329. Who?
330. What reason did he give for this?
331. Was Pelhambridge active at this time?
332. Was it involved in this new plan relating to APHC?
333. So why was there a concern over ownership of Pelhambridge at this time?
334. On Page 6 (Bates ending 317), whose handwriting is this?
335. Could you please read what is written here out loud?
336. What is AML?
337. Why were you concerned with AML?
338. Who gave you the information that’s written there?
339. Turning to pages 15 -16 (Bates ending 326 and 327), who is listed as the beneficial owner of SES?
340. What is the date of this document?
341. On Page 19 (Bates ending 330), the document reads “Client Party Profile”. What is a client party profile?
342. Did you type this?
343. Do you know who did?
344. What is the date of this document?
345. What is Diversified Land Holdings?
346. What was the “new IOM company”?
347. At this point, had Pelhambridge already been formed?
348. Who gave you the information that’s written in the first paragraph?
349. The second paragraph reads, “It was noted to SM that he would have to be noted in our records as the owner of any new IOM Company, that it would have to be records in his US Tax Return and all profits of DLHI, would be subject to US tax and any distribution or payment to the IOM Company would be probably be subject to US withholdings tax.” Did you tell Shaun Mooney this?
350. Was anyone else at this meeting?
351. Page 26 appears to be a typed note to the file that is similar to the one we just looked at on page 19.
352. Do you recognize this document?

353. Did you compose this document?
354. Turning to the fifth paragraph from the top, this paragraph refers to Pelhambridge.
355. Is this the “new IOM company” referred to in the preceding paragraph?
356. Turning to page 21 (Bates ending 332) what is shown on this page? (SM’s passport)
357. And what is shown on pages 24 and 25 (Bates ending 335 and 336) – what are these?
358. When did IOMFT ask for and obtain these documents?
359. For what purpose?
360. Show Govt. Ex. 1-47 - do you recognize this?
361. What is it?
362. What is the date?
363. Did you create this document?
364. What is the purpose of this document?
365. Turning to the top of page 1, it says “Lynx Ref: CO1876.” What is this? Is this the reference number for Pelhambridge? What was the reference number for SES?
366. Who is now identified as the beneficial owner of Pelhambridge?
367. Turning to p. 2. (Bates ending 370), first full paragraph on the right below “client party profile.” Could you please read that paragraph out loud?
368. Do you know who wrote this?
369. When you say you “considered the company to be his” what company are you referring to?
370. Turning your attention to the last sentence of this paragraph, you write that “this is a tax efficient way to reward SES for his work.” What do you mean by tax efficient?
371. Who provided you with the information that it would be tax efficient?
372. Were you referring to rewarding Shaun Mooney even though you write SES?
373. Turning to page 4 (Bates ending 372), there is a discussion of Eduard Venerabile’s address. Was there an issue determining his address?
374. What was this issue?
375. How was the issue resolved?
376. What did the photographs depict?
377. Turning to the last page of the document, do you recognize the handwriting?
378. Whose is it?
379. What is the purpose of this note?
380. Where did you see this passport?
381. Show Govt. Ex. 2-75 – do you recognize this document?
382. What is it?
383. There are two dates on this document. Why?
384. What do the two dates represent?
385. Who prepared this document?
386. Who is Emma?
387. Is the same Emma we discussed previously?
388. There are some initials on the upper right hand corner. Do you recognize these?
389. What are they?
390. Why did you initial this form?
391. Why did you need to get KYC on Mr. Pursley?
392. Turning to page 9 (Bates ending 364) – what is this?
393. Did you request this?

394. Why did you need a letter of reference for JSP?
395. In August and early September 2009, you were still obtaining KYC documents, correct?
396. Show Govt. Ex. 2-34 – do you recognize this?
397. What is it?
398. What was your understanding of Mr. Mellor’s statement that “we are yet to rectify the ownership of Pelhambridge”?
399. Why was there a need to do this??
400. What would that entail from IOMFT’s perspective?
401. Mellor also writes that “we will need to go through the files and take out anything related to Shaun as B/O.” What does this mean? Why would you need to clear the file of this information?
402. There is a handwritten note on this document.
403. Do you know who wrote this?
404. Paragraph 1 of your email references a trip. What trip was this?
405. What was the purpose of the trip to the Bahamas?
406. Who were you going to meet?
407. Who was paying for the trip?
408. Who suggested the Bahamas?
409. Was there a reason why you did not meet in the IOM?
410. Did you in fact go to the Bahamas?
411. Who went with you from IOMFT?
412. How many meetings did you have?
413. Who did you meet with?
414. Describe the meeting(s)
415. How long did the meeting(s) last?
416. Who spoke at the meeting(s)?
417. Had you ever met Mr. Venerabile prior to meeting him in the Bahamas?
418. What did Mr. Pursley say at the meeting(s)?
419. Did you meet with Shaun Mooney while you were there?
420. Did you discuss ownership of SES on this trip?
421. Who did you discuss it with?
422. Who was present when you were discussing the ownership of SES?
423. What did Mr. Pursley say about who owned the company?
424. Following your meeting with Mr. Venerabile in the Bahamas, did you ever meet with him again?
425. How many times total have you met with Eduard Venerabile?
426. Show Govt. Ex. 1-51 – do you recognize this?
427. What is it?
428. Did you create this document?
429. When?
430. What is the date on the document?
431. Who provided you with the information contained in this note?
432. Directing you to page 2, paragraph under “Pelhambridge” states that Pelhambridge already has “investment in SM’s US company Diversified Land LLC.” Was this to your knowledge true?
433. When did those purported investments occur?

434. Did you play a role in any of those investments?
435. Page 2 at bottom it says that over the next several months there will be “further dividend requests and those monies will be invested in a series of new companies”; at this point, IOMFT had already transferred \$3.62M from the SES RBS account to Gillis’s IOLTA account, correct?
436. What did you understand the further requests for dividends to be allotted for?
437. Had there already been a request for a dividend?
438. From whom?
439. For how much?
440. You called these investments. Who was investing in what, to your knowledge?
441. Show Govt. Ex. 1-65 – do you recognize this document?
442. What is it?
443. Is this an example of a request for a dividend that IOMFT received?
444. Show Govt. Ex. 2-30 – what is this document?
445. Is this a different version of the same document you say in Govt. Ex. 1-51?
446. What was the purpose of “build[ing] a client profile”?
447. Turning to pages 2-3 (Bates ending 135 and 136) of this document, what is this?
448. Is this a different version of the File Note we just reviewed, Govt. Ex. 1-51?
449. Here under “Pelhambridge” paragraph it says that Pelhambridge has investments into “Four Fields LLC.”
450. What is this?
451. Who provided you with the information contained in this note?
452. Show Govt. Ex. 2-35 – do you recognize this document?
453. What is it?
454. What was the purpose of creating a consulting agreement for Eduard Venerabile? What services did you understand he would provide?
455. Who asked for Mr. Venerabile to get paid as a consultant?
456. Do you know why Mr. Pursley wanted to pay Venerabile as a consultant?
457. Show Govt. Ex. 2-23 – do you recognize this document?
458. What is it?
459. On what date did the telephone conversation take place?
460. Who was the telephone conversation between?
461. On the right side of the document where it says “repeated to,” whose initials are those?
462. Why did you initial this form?
463. What was Mr. Pursley’s request with respect to Mr. Venerabile’s consulting agreement payments?
464. What was the issue with respect to the ability of Pelhambridge to make the requested payments?
465. What did you understand Mr. Mellor’s reference that “funds should be converted if necessary” to mean?
466. Show Govt. Ex. 2-73 – do you recognize this document?
467. What is it?
468. Do you know who was on the BOD of Pelhambridge?
469. What is the date of these meeting minutes?
470. Why was the loan from SES to Pelhambridge written off?
471. Who signed these minutes?

472. Show Govt. Ex. 2-13 – do you recognize this? What is it?
473. Directing your attention to page 3 (Bates ending 402) – do you see a dividend payment of \$3.625 on August 28, 2009?
474. What does this represent?
475. Where was the money sent?
476. Turning to p. 8 (Bates ending 407), what is the balance shown on March 1, 2010 at the top of the page?
477. Turning to page 9 (Bates ending 408). What was the balance show on 12/20/2012? Are the three dividend payments to Australian Partners also show there?
478. What were these?
479. Apart from these transfers, were you aware of any earlier transfers out of the SES RBS account?
480. Did you understand that any of the transfers out of the SES RBS account were going to be for the benefit of Mr. Pursley?
481. Did you have any role with respect to the actual wire transfer of funds out of the SES account to the United States?
482. How did you know what account to transfer the money to?
483. How did you know the amount of money to transfer?
484. Have you heard of a United States corporation called Gulf States Management Corp?
485. Who owns Gulf States?
486. Have you heard of a United States corporate called Four Sevens Investment Corporation?
487. Who owns it?
488. Turning your attention to the following exhibits: 2-55; 2-77; 1-14; 2-78; 1-24; 1-28; 1-30; 2-56; 2-73. Do you recognize these?
489. What are they?
490. Do all of these exhibits pre-date the purchase of IOMFT by Boston Limited?
491. Do these documents list several different people as serving on the BOD of Pelhambridge over the years?
492. Were all the people employees of IOMFT?
493. Do you know who created these documents?
494. Would it have been someone who attended the BOD meeting?
495. Was it the normal course of IOMFT's business to hold board meetings for its clients' companies?
496. Was it the normal course of IOMFT's business to document those meeting at or near the time of the events with minutes?
497. Turning your attention to the following exhibits: 1-13; 1-23; 1-29. Do you recognize these exhibits? What are they?
498. Do all of these exhibits pre-date the purchase of IOMFT by Boston Limited?
499. Do you know who created these documents?
500. Who are the documents signed by?
501. Are they signed by employees of IOMFT?
502. Was it the normal course of IOMFT's business to have a member of the board sign stock purchase agreements involving companies IOMFT represented?
503. Was it the normal course of IOMFT's business to maintain copies of those documents in the client file?

504. Show Govt. Ex. 2-40, 2-42, 2-43, 2-46, 2-51, 2-54, 2-58, 2-59, 2-60, 2-62, 2-63, 2-65, 2-67, 5-20, 5-35, 5-36 – do you recognize these documents?
505. What are they?
506. While working on the SES and Pelhambridge accounts, was A. Mellor in direct communication with Shaun Mooney, Steve Pursley, and Eduard Venerabile?
507. Did he communicate with them via email, phone and fax?
508. Did you ever email with A. Mellor via an IOMFT email account?
509. What was A. Mellor's email address while he worked at IOMFT?
510. Was "@iomgroup.co.im" the domain name for all email addresses for employees of IOMFT?
511. Show Govt. Ex. 1-74, 3-3, 3-4, 3-5, 3-7, 3-8, 3-9, 3-10, 3-11, 3-12, 3-13, 3-16, 3-18, 3-20, 3-23, 3-24. Do you recognize these documents?
512. Are these all emails between A. Mellor and Eduard Venerabile?
513. Show Govt. Ex. 12-5, 4-118, 12-43, 12-48, 12-4 and 12-41 – do you recognize these emails?
514. What are they?
515. Show Govt. Ex. 12-48 – do you recognize this document?
516. What is it?
517. Turning to the bottom of page 1, top of page 2, is this an email you wrote to Mr. Pursley?
518. What payment are you addressing in this email?
519. Show Govt. Ex. 2-13 – do you recognize this?
520. What is it?
521. Turning to page 3 (Bates ending 402) of this document. There is a payment entitled "Dividend Payment –APHL" for \$3,625,000. What was this payment for?
522. Show Govt. Ex. 1-15 and 1-16 – do you recognize these documents?
523. What are they?
524. Show Govt. Ex. 1-15 – does this reflect a transfer of \$961,000 going from SES's account at RBS to IOMFT clients account?
525. What is a client account?
526. To your knowledge did IOMFT maintain a client account at RBS?
527. What is the date of that transfer?
528. Show Govt. Ex. 1-16 – does this reflect a \$960,000 transfer from IOMFT client account to an account in the name of Diversified?
529. What is the date of that transfer?
530. Were you aware of these transfers taking place?
531. Show Govt. Ex. 1-25 and 1-26
532. Do you recognize these documents?
533. What are they?
534. Do these show a transfer of \$875,000 from SES's RBS account to IOMFT client's account, then out to Diversified?
535. What was the date of those transfers?
536. Were you aware of those transfers taking place?
537. Show Govt. Ex. 2-69. Do you recognize this document?
538. What is it?
539. Does it reflect the same transfer as listed in document 1-25?
540. To your knowledge, did Pelhambridge have a bank account?

- 541. Show Govt. Ex. 1-106. (Pelhambridge account opening record)
- 542. Do you recognize this?
- 543. What is it?
- 544. Show Govt. Ex. 1-107 and 1-108. Do you recognize these documents?
- 545. What are they?
- 546. Turning to Ex. 1-107, does this show a transfer of \$960,000 from SES's RBS account to Pelhambridge's account?
- 547. What is the date of that transfer?
- 548. Show Govt. Ex. 1-108, does this show a transfer from Pelhambridge's account to and account in the name of Diversified for \$899,965?
- 549. What is the date of that transfer?
- 550. Were you aware of these two transfers at the time?
- 551. Show Govt. Ex. 2-70 – do you recognize this document?
- 552. What is it?
- 553. Does it reflect a transfer of the same amount on the same day as that reflected in Ex. 1-108?
- 554. Show Govt. Ex. 2-36 – do you recognize this document?
- 555. What is it?
- 556. Show Govt. Ex. 2-37 – do you recognize this document?
- 557. What is it?
- 558. What is the date of this email?
- 559. Did you discuss payments to Mr. Venerabile?
- 560. Show Govt. Ex. 2-38 – what is this document?
- 561. Why was there a need for Mr. Venerabile to have consulting agreements with both SES and Pelhambridge?
- 562. Do you know whether in fact he was paid any money out of the SES or Pelhambridge accounts at Royal Bank of Scotland?
- 563. At whose direction, if you know?
- 564. Show Govt. Ex. 2-68 – do you recognize this document?
- 565. What is it?
- 566. What was Mr. Pursley's request with respect to the payments to Mr. Venerabile?
- 567. Did IOMFT honor that request to your knowledge?
- 568. Show Govt. Ex. 2-72 – what is this document?
- 569. What is the date of the meeting minutes?
- 570. What is attached?
- 571. What is the purpose of approving a document like the unanimous written consent of the shareholders?
- 572. Did you have any role in the approval of these documents?
- 573. Do you know who C. Brown is?
- 574. Do you know who A. McNee is?